Comments
By the Sacramento Regional County Sanitation District on
Draft CALFED Water Quality Program Component Report

Section 3. Parameters of Concern

In general this is similar to a textbook discussion of possible parameters of concern. In the way it is written, the implication is that the potential impacts described for each parameter are occurring in the Delta. In reality, as pointed out elsewhere in the report, this is not necessarily the case. It would be beneficial to qualify this discussion so that it is not misinterpreted.

Section 4. Sources and Loadings of Parameters

Under Sources of Parameters:

Delete "acidic" from mine drainage discussion as the primary sources of mercury are not acid mine drainage.

Add air deposition as a source of water quality parameters of concern. Possible wording: "air deposition that may contribute metals such as lead and mercury, pesticides such as diazinon, and other organics such as dioxin."

The 3-dimensional graphic displays that are part of the tables in Section 4 are easy to read, but could be misleading. The information in the matrix-format portion of each table shows the many areas where little or no data exists. On the graphic portion of the table however, these areas appear to have no contribution at all, when they could actually have a very significant contribution.

Section 5. Water Quality Problem Areas

The opening several sentences are excellent and capture an important aspect of the challenge associated with addressing water quality issues in the Delta and in upstream waters.

The remainder of this section is brief and fairly weak.

We are concerned about the reliance on the US EPA Section 303(d) listing. These lists are based on: (1) old sampling data collected prior to implementation of proper QA/QC; (2) total recoverable rather than dissolved metals; and (3) comparison with criteria and guidelines which have not been legally adopted and therefore do not constitute water quality standards. This discussion should be qualified by pointing out that this list is based on old data and is in need of updating.

A preferable approach is to compare existing water quality monitoring data collected using proper QA/QC with the water quality objectives contained in the Basin Plans and US EPA 304(a) criteria. The 304(a) criteria should be identified as recommended criteria that is subject to site-specific adjustment by the State and/or the Regional Boards.

Section 7. Action Strategies

We appreciate that the comments we made in our November 27, 1996 letter are reflected in this section.

The second paragraph on page 7-1, concerning mercury, is an excellent discussion.

The Action under Wastewater and Industrial Discharges on page 7-8 to reduce the toxic impacts of oxygen depleting substances and copper and mercury loading should be clarified. As now written, it is not clear whether this action regarding copper and mercury applies to discharges to the entire Delta and Delta tributaries or only to discharges to the Suisun Bay and Carquinez Strait area. We believe it is inappropriate to apply copper and mercury controls to POTW's in the Sacramento River Basin because, as indicated in Section 4, POTW's are only a small percentage of the total loading (2.5% in the case of copper and about the same for mercury, although mercury data are not reported). If the actions pertaining to copper and mercury are retained, it would be preferable to separate oxygen-related actions from copper and mercury-related actions. Under methods, increased incentives for industries to pre-treat discharges containing copper and mercury is identified. Our data show that industries discharging to POTW's are not a significant source of either copper or mercury. Therefore, this method should be broadened to address source control and best management practices for industrial, commercial and residential sources.

The action to reduce the toxic effects of ammonia from wastewater treatment plant discharge through improved treatment (page 7-9) should be modified. This action should be modified to focus on portions of the Delta where ammonia from wastewater treatment plants is exerting toxic effects. As far as we know ammonia from wastewater treatment plant discharges to the Sacramento River are not causing toxicity.

Section 8. Watershed Coordination

We agree with the concepts and approach described in this two-page section. Please note that the correct name for the program on the fourth line of the last paragraph is the Sacramento River Toxic Pollutant Control Program.

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